

Neel Chatterjee (SBN 173985)
nchatterjee@goodwinlaw.com

GOODWIN PROCTER LLP
135 Commonwealth Drive
Menlo Park, California 94025
Tel.: +1 650 752 3100
Fax.: +1 650 853 1038

Brett Schuman (SBN 189247)
bschuman@goodwinlaw.com

Shane Brun (SBN 179079)
sbrun@goodwinlaw.com

Rachel M. Walsh (SBN 250568)
rwalsh@goodwinlaw.com

GOODWIN PROCTER LLP
Three Embarcadero Center
San Francisco, California 94111
Tel.: +1 415 733 6000
Fax.: +1 415 677 9041

Hong-An Vu (SBN 266268)
hvu@goodwinlaw.com

GOODWIN PROCTER LLP
601 S. Figueroa Street, 41st Floor
Los Angeles, California 90017
Tel.: +1 213 426 2500
Fax.: +1 213 623 1673

*Attorneys for Defendant
Otto Trucking LLC*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Waymo LLC,

Plaintiff,

v.

Uber Technologies, Inc.; Ottomotto LLC; Otto
Trucking LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF NEEL CHATTERJEE
IN SUPPORT OF OTTO TRUCKING'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL PORTIONS OF ITS
SUPPLEMENTAL PROPOSED PRETRIAL
ORDER**

Trial Date: October 10, 2017
Courtroom: 8, 19th Floor
Judge: Hon. William Alsup

Filed/Lodged Concurrently with:
1. Admin. Mtn. to File Document Under Seal
2. [Proposed] Order
3. Redacted/Unredacted Version
4. Proof of Service

I, Neel Chatterjee, declare as follows:

1. I am a partner at the law firm of Goodwin Procter LLP, counsel of record for Defendant Otto Trucking LLC (“Otto Trucking”). I make this declaration based upon matters within my own personal knowledge and if called as a witness, I could and would competently testify to the matters set forth herein. I make this declaration in support of Defendant Otto Trucking’s Administrative Motion to File Under Seal Portions of Its Supplemental Proposed Pretrial Order (the “Supplemental Proposed Pretrial Order”).

2. I have reviewed the following document and confirmed that the portions identified below merit sealing:

Document	Portions to Be Filed Under Seal	Designating Parties
Supplemental Proposed Pretrial Order	Highlighted portions	Waymo (green)

3. The above referenced portions of the Supplemental Proposed Pretrial Order highlighted in green contain information that Waymo has designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Protective Order in this case. Otto Trucking states no position about whether the confidentiality designations are appropriate. Otto Trucking anticipates that Waymo will file any necessary declarations to seal the above information pursuant to Local Rule 79-5.

4. Otto Trucking’s request to seal is narrowly tailored to those portions of the Supplemental Proposed Pretrial Order that merit sealing.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 26th day of September, 2017 in Menlo Park, California.

/s/ Neel Chatterjee
Neel Chatterjee